

1 **UNITED STATES DISTRICT COURT**
2 **EASTERN DISTRICT OF NEW YORK**

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3 **PRINCE ABRAHAM,**

CASE NO.: 1:14-cv-06608-ILG-SMG

4 **Plaintiff,**

5 **-against-**

**PLAINTIFF'S MOTION TO
ADJOURN THE INITIAL
CONFERENCE**

6 **NATIONAL CREDIT SYSTEMS, INC.,**

7 **Defendant.**

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8 Prince Abraham ("Plaintiff"), by and through his counsel, respectfully requests an
9 adjournment of the Initial Conference, presently scheduled for Monday, March 2, 2015 at 10:00
10 a.m. See Dkt. No. 4. In support of this Motion, Plaintiff states the following:

11 1. On November 10, 2014, Plaintiff initiated this action by filing a complaint
12 against National Credit Systems, Inc. ("Defendant") for its alleged violations of the Fair Debt
13 Collection Practices Act, 15 U.S.C. § 1692, *et seq.* ("FDCPA"). See Dkt. No. 1.

14 2. On December 31, 2014, this Honorable Court issued an Order setting the Initial
15 Conference for March 2, 2015 at 10:00 a.m. See Dkt. No. 4.

16 3. On January 26, 2015, Plaintiff effectuated personal service of the Summons and
17 Complaint on Defendant, and he filed the executed proof of service with this Court on January
18 28, 2015. See Dkt. No. 5.

19 4. Defendant's Answer to the Complaint or other responsive pleading was therefore
20 due on February 16, 2015. See id.

21 5. However, Defendant has not yet filed an Answer to Plaintiff's Complaint or any
22 other responsive pleading.
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of Plaintiffs' Motion to Adjourn the Initial Conference was filed and served this 24th day of February, 2015, upon the following via CM/ECF and First Class Mail:

National Credit Systems, Inc.
c/o Corporation Process Company
328 Alexander Street
Suite 10
Atlanta, Georgia 31131

By: /s/ Craig Thor Kimmel
Craig Thor Kimmel, Esquire